

Hanna Wilkerson,

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: BOSTON SCIENTIFIC CORP.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2326

THIS DOCUMENT RELATES TO

HANNA WILKERSON,

Plaintiff,

v.

2:13-cv-4505

BOSTON SCIENTIFIC CORPORATION,

Defendant.

VIDEOTAPED DEPOSITION OF HANNA WILKERSON

Tuesday, April 29, 2014

Huntersville, North Carolina

9:01 a.m.

Reported by: Karen K. Kidwell, RMR, CRR, CLR

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EXHIBIT

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1 Q. And then Number 13 is any documents
2 relating to any comments or statements made to you at
3 any time by any representative of Boston Scientific.
4 Do you have any such documents?

5 A. Yes, I do.

6 Q. What is that?

7 A. It was, I think, in the very beginning, I
8 was given a list of -- of things, but I don't have
9 them with me.

10 Q. Can you explain what you mean by that?
11 Who gave it to you?

12 A. My -- my lawyer sent it to me.

13 Q. Okay. And my question, just so we don't
14 get into any privileged communications, everything
15 you talked to your lawyer about and your lawyer talks
16 to you about is attorney-client privileged.

17 A. Right.

18 Q. Okay. So don't tell me anything that your
19 lawyer sent you that your lawyer generated.

20 A. Oh, okay.

21 Q. But if you have anything from Boston
22 Scientific?

23 A. No. No, I don't.

24 Q. All right.

25 MR. CANTRELL: Hanna, if you don't mind,

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1 lengthy.

2 BY MS. PACKER:

3 Q. Do you recall discussion -- discussing any
4 other options other than surgery?

5 A. No.

6 Q. Is it your practice to ask doctors
7 questions about their recommendations for you?

8 A. Not in general.

9 Q. Do you recall if you did any research on
10 your own prior to the surgery about the surgery that
11 she was proposing to do?

12 A. I did not do any research.

13 Q. You trust Dr. Booth's recommendation?

14 A. I did.

15 Q. Do you recall signing an informed consent
16 form?

17 A. I do not recall.

18 (Wilkerson 3 was marked for identification.)

19 BY MS. PACKER:

20 Q. Ms. Wilkerson, the court reporter has
21 handed you what we've marked as Exhibit 3, which I
22 will admit is a very poor copy.

23 A. Yeah.

24 Q. But it's the best we have. And it appears
25 to be a consent form for Dr. Booth to perform surgery

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1 on you.

2 A. Yes.

3 Q. Does that appear to be your signature
4 where the signature block says, "patient"?

5 A. I -- that is my signature.

6 Q. And there is some initials that appear
7 just above that, "HW." Do those appear to be your
8 initials?

9 A. That is my initial, yes.

10 Q. And this consent form is dated
11 February 12th, 2010; is that correct?

12 A. Yes, it is.

13 Q. Do you -- having seen this now, do you
14 believe that this is a consent form that you signed
15 on February 12th, 2010?

16 A. Yes.

17 Q. Do you believe that you would have read it
18 at the time that you signed it?

19 A. I think I do remember that visit. That
20 was not with Dr. Booth. That was a preop visit that
21 was actually done by somebody else. Now I recall
22 that.

23 Q. Somebody else in Dr. Booth's practice?

24 A. No, somebody else in the hospital.

25 Q. So this pre-operative visit took place in

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1 Q. Before you were in contact with a lawyer,
2 did you read anything about the FDA announcement?

3 A. No, ma'am.

4 Q. Have you received any information about
5 the FDA from any source other than your lawyer?

6 A. No, ma'am.

7 Q. Did Dr. Booth or anyone from her practice
8 give you any written information about the procedure
9 that you would be undergoing?

10 A. I do not recall that.

11 Q. Have you done any research on your own,
12 not through your lawyer, since the time of your
13 surgery about pelvic mesh on the Internet or any
14 other way?

15 A. I would not say research per se. I read
16 about it, but I did not go into like deep, deep dig
17 into it, no.

18 Q. What types of things have you read?

19 A. That it is very uncertain.

20 Q. In --

21 A. And, basically, kind of concluded what I
22 experienced myself.

23 Q. And where have you read this information,
24 what sources?

25 A. Online.